

Exhibit D

STATE OF WISCONSIN
COUNTY

CIRCUIT COURT

TAYLOR

In the Interest of J. Doe, an unborn child and

Tamara M. Loertscher, the unborn child's expectant mother
Dob: [REDACTED]

FILED
AUG 13 2014

TONI MATTHIAS
PROBATE/JUVENILE DIVISION
TAYLOR COUNTY, WIS.

MOTION TO TAKE EXPECTANT MOTHER INTO IMMEDIATE CUSTODY
Pursuant to Wis. Stat. 48.193(1)(c); 48.193(d)(3)

Taylor County Corporation Counsel Courtney Graff, with the support of the attached affidavit and supporting attachments, requests the following relief from the court.

An Order of the Court finding the following:

1. That TCHSD made reasonable efforts to prevent the removal of the child from the home but an emergency situation necessitated this present action.
2. That it is contrary to the unborn child's best interest for her mother, Tamara Loertscher, to be released from custody and returned home due to the expectant mother's habitual use of controlled substances and her violation of the TPC Order.
3. That the conditions of an Order for Temporary Physical Custody, entered by Taylor County Circuit Court on August 5th, 2014, have been violated.
4. That pursuant to Wis. Stat. §48.193(d)(2), Tamara M. Loertscher be taken into custody by Taylor County law enforcement.
5. That the adult expectant mother, Tamara M. Loertscher, shall be held in custody under s. 48.207(1m).
6. That the Taylor County Sheriff's Department or any other assisting law enforcement agency be granted the authority to carry out this Order.

Dated: August 13, 2014.

By the Court:


Courtney L. Graff
Taylor County Corporation Counsel
State Bar No. 1085078

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14-JC-PROBATE/JUVENILE DIVISION
TONI MATTHIAS
TAYLOR COUNTY, WIS.

AFFIDAVIT

Being duly sworn, I state the following:

1. I am the Deputy Director for Taylor County Human Services Department—Children and Family Unit. The following statement are based on personal knowledge.
2. A CHIPS petition pursuant to Wis. Stat. §48.133 alleging that the unborn child is in need of court-ordered services was filed with this Court on August 5, 2014.
3. A Temporary Physical Custody (TPC) Request was filed on August 4th, 2014.
4. A hearing on the TPC request was held on August 5, 2014, and a TPC Order resulted was entered in Taylor County Circuit Court. [attached]
5. The TPC Order required Tamara Loertscher, the expectant mother, to comply with the conditions of the order (see attached TPC Order). Specifically, Ms. Loertscher was ordered to be placed at a licensed treatment facility once released from Luther Hospital in Eau Claire, Wisconsin.
6. Ms. Loertscher has not been in contact with TCHSD to comply with the conditions of the TPC Order. Specifically, Ms. Loertscher has refused treatment, and has not presented herself to the licensed treatment facility designated by TCHSD.
7. Further, pursuant to 48.193(1)(c), the expectant mother is refusing to accept any alcohol or other drug abuse services offered to her. She is not making a good faith effort to participate in any alcohol or other drug abuse services offered to her.
8. I make this sworn statement in support of the motion to take Ms. Loertscher, an expectant mother, into custody pursuant to Wis. Stat. §48.193(d)(2).

Dated: August 11, 2014.



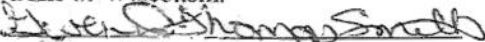
Liza Daleiden

Deputy Director, Taylor County Human Services Department

Sworn to before me on: August 11, 2014

Taylor County, Medford, Wisconsin.

State of Wisconsin.



(notary public)

My Commission expires/is permanent: 10.12.14